

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

RESIDENTIAL CAPITAL, LLC, *et al.*,

Debtors.

Bankruptcy Case No. 12-12020 (MG)  
Chapter 11

Jointly Administered

ROWENA DRENNEN, individually and as the  
representatives of the *KESSLER* SETTLEMENT  
CLASS, *et al.*,

Plaintiffs,

vs.

CERTAIN UNDERWRITERS AT LLOYD'S OF  
LONDON, *et al.*,

Defendants.

**RELATED CASE**

District Court  
Case No. 1:15-cv-02712 (JPO)

Adversary Case No. 15-01025 (DSJ)

**PLAINTIFFS' NOTICE OF MOTION AND MOTION TO WITHDRAW THE  
REFERENCE OF THIS ACTION FROM THE BANKRUPTCY COURT**

TO THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

PLEASE TAKE NOTICE that Plaintiffs Rowena Drennen, Flora Gaskin, Roger and Christie Turner, John and Rebecca Picard, individually, and as the representatives of the Kessler Settlement Class; Steven and Ruth Mitchell, individually, and as representatives of the Mitchell Settlement Class; and the ResCap Liquidating Trust, as successor to Residential Funding Company, LLC, (collectively “Plaintiffs”) respectfully request that this Honorable Court enter an order withdrawing the reference of this action from the Bankruptcy Court, pursuant to 28 U.S.C. § 157(d), Fed. R. Bankr. P. 5011(a), and Local Bankruptcy Rule 5011-1. In support of this Motion, Plaintiffs rely upon the arguments and authorities presented in their accompanying Memorandum of Law, and the supporting declaration and exhibits thereto, which are incorporated as if set forth herein.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court withdraw the reference of this action from the Bankruptcy Court pursuant to 28 U.S.C. § 157(d), Fed. R. Bankr. P. 5011(a), and Local Bankruptcy Rule 5011-1, and grant such other and further relief as is equitable and just.

Dated: April 18, 2023

**By:** /s/ R. Frederick Walters

**WALTERS RENWICK RICHARDS  
SKEENS & VAUGHAN, P.C.**

R. Frederick Walters, Esq.  
Karen W. Renwick, Esq.  
David M. Skeens, Esq.  
Michael B. Sichter, Esq.  
1100 Main, Suite 2500  
Kansas City, Missouri 64105  
(816) 421-6620 (Telephone)  
(816) 421-4747 (Facsimile)  
[fwalters@wrrsvlaw.com](mailto:fwalters@wrrsvlaw.com)  
[krenwick@wrrsvlaw.com](mailto:krenwick@wrrsvlaw.com)  
[dskeens@wrrsvlaw.com](mailto:dskeens@wrrsvlaw.com)  
[msichter@wrrsvlaw.com](mailto:msichter@wrrsvlaw.com)  
*Counsel for the Kessler Class*  
*Counsel for the Mitchell Class*

**CARLSON BROWN**

R. Bruce Carlson  
222 Broad St.  
PO Box 242  
Sewickley, PA 15143  
(724) 730-1753  
[bcarlson@carlsonbrownlaw.com](mailto:bcarlson@carlsonbrownlaw.com)  
*Counsel for the Kessler Class*

**LYNCH CARPENTER, LLP**

Gary F. Lynch  
Edwin J. Kilpela  
Kelly K. Iverson  
1133 Penn Avenue, 5th Floor  
Pittsburgh, PA 15222  
T: (412) 322-9243 F: (412) 231-0246  
[gary@lcllp.com](mailto:gary@lcllp.com)  
[ekilpela@lcllp.com](mailto:ekilpela@lcllp.com)  
[kelly@lcllp.com](mailto:kelly@lcllp.com)  
*Counsel for the Kessler Class*

**By:** Selena J. Linde

**PERKINS COIE, LLP**

Selena J. Linde, Esq.  
Vivek Chopra, Esq.  
Karin S. Aldama, Esq.  
Alexis Danneman, Esq.  
Janet M. Howe, Esq.  
700 13th St. NW, Suite 600  
Washington, DC 20005  
Telephone (202) 654-6200  
Facsimile (202) 654-9952  
[SLinde@perkinscoie.com](mailto:SLinde@perkinscoie.com)  
[VChopra@perkinscoie.com](mailto:VChopra@perkinscoie.com)  
[KAldama@perkinscoie.com](mailto:KAldama@perkinscoie.com)  
[ADanneman@perkinscoie.com](mailto:ADanneman@perkinscoie.com)  
[JHowe@perkinscoie.com](mailto:JHowe@perkinscoie.com)  
*Counsel for the ResCap Liquidating Trust*

**CERTIFICATE OF SERVICE**

I hereby certify that I filed this document electronically with the United States District Court for the Southern District of New York with notice of case activity to be generated and sent electronically by the Clerk of the Court to all designated persons this: **18<sup>th</sup> day of April 2023.**

**By:** /s/ R. Frederick Walters  
**WALTERS RENWICK RICHARDS**  
**SKEENS & VAUGHAN, P.C**